

ORIGINAL

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

SPECIAL SERVICES REFORM, 1996

Docket No. MC96-3

UNITED STATES POSTAL SERVICE  
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO  
THE OFFICE OF THE CONSUMER ADVOCATE WITNESS CALLOW  
(USPS/OCA-T300-18-21)

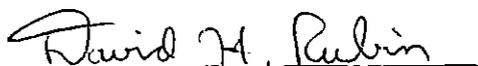
Pursuant to rules 25 and 26 of the Rules of Practice and Procedure and rule 2 of the Special Rules of Practice, the United States Postal Service directs the following interrogatories and requests for production of documents to the Office of the Consumer Advocate witness Callow: (USPS/OCA-T300-18-21).

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
David H. Rubin

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2986; Fax -5402  
October 22, 1996



**INTERROGATORIES OF UNITED STATES POSTAL SERVICE  
TO OFFICE OF THE CONSUMER ADVOCATE WITNESS CALLOW**

**USPS/OCA-T300-18.** Please provide the complete derivation, including diskettes for any spreadsheets, of the cost per box data in OCA-LR-3, pages 1 and 3, column 3, as revised October 8, 1996. In particular, please explain how the total costs for post office boxes provided in USPS-T-5, Exhibit E, at 8 are separated into the three components of costs used in LR-SSR-119.

**USPS/OCA-T300-19.** Please refer to your testimony at page 26, line 17, to page 27, line 1. Are you saying that post office box customers receive a lower value of service from their post office box service than they get from carrier delivery? If so, why do you think these customers are choosing post office box service, instead of or in addition to carrier delivery?

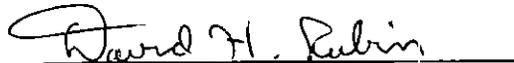
**USPS/OCA-T300-20.** Please refer to your testimony at page 27, lines 3-5. Please provide specific cites to witness Carlson's testimony where he discusses the low value of post office box service.

**USPS/OCA-T300-21.** Please refer to your testimony at page 28, lines 15-18. Please provide a table comparable to that provided by witness Needham, at USPS-T-7, Table IV, at 12, showing the percentage difference between your proposed Group I, size 1 fees and the CMRA fees presented in USPS-T-4, Table 11, at 22.

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

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David H. Rubin